

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
ROUBEN MADIKIAN, _____)	
)	
Plaintiff, _____)	
)	
v. _____)	No. 1:04-cv-12451-JLT
)	
AMERICAN AIRLINES ASSOCIATION)	
OF PROFESSIONAL FLIGHT)	
ATTENDANTS ("APFA"), et al., _____)	
)	
Defendants. _____)	
)	

CONSENTED MOTION FOR LEAVE
TO FILE REPLY BRIEF

Defendants Association of Professional Flight Attendants ("APFA"), Julia Carrigan, and Amy Milenkovic ("Union defendants") respectfully move the Court, with the consent of opposing counsel, for leave to file a short reply brief in support of their Motion to Dismiss Second Amended Complaint. In support of their motion, the Union defendants state as follows:

1. On March 31, 2005, the Union defendants moved to dismiss plaintiff's Second Amended Complaint, arguing that none of the federal causes of action stated a claim upon which relief could be granted, and that the Court should decline to exercise supplemental jurisdiction over plaintiff's state-law claims.

2. Plaintiff filed a memorandum in opposition to the Union defendants' motion on May 2, 2005. While the Union defendants do not believe that plaintiff's opposition requires extensive rebuttal, they do believe that a brief reply targeted to several specific points advanced by plaintiff will assist the Court in resolving this matter.

3. On May 6 and 7, 2005, counsel for the Union defendants consulted by electronic mail with plaintiff's counsel, who authorized counsel to state that he did not oppose the instant motion for leave to file a reply brief.

4. The proposed Union Defendants' Reply Brief in Support of Motion to Dismiss Second Amended Complaint is submitted herewith for filing, should this motion be granted.

For these reasons, the Union defendants respectfully request that their motion be granted and that they be permitted to file the attached reply brief.

Respectfully submitted,

_____/s/ David B. Rome_____
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Counsel for the Union Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Consented Motion for
Leave to File Reply Brief was served by first-class mail,
postage prepaid, this 10th day of May, 2005, as follows:

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_____/s/ David B. Rome_____
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